

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

JASON LEE VAN DYKE	§	
Plaintiff	§	
	§	
v.	§	Case No. 4:18cv247
	§	
THOMAS CHRISTOPHER RETZLAFF	§	
a/k/a Dean Anderson d/b/a BV Files, Via	§	
View Files L.L.C., and ViaView Files	§	
Defendant	§	

**PLAINTIFF'S INITIAL DISCLOSURES**

To: Thomas Christopher Retzlaff, Pro Se Defendant, at PO Box 46424, Phoenix, AZ 85063.

Plaintiff, Jason Lee Van Dyke, makes these initial disclosures as required by Rule 26(a)(1) of the Federal Rules of Civil Procedure and the orders of the Court.

**A. DISCLOSURES ORDERED BY THE COURT**

1. The true legal name of Plaintiff is Jason Lee Van Dyke. The true legal name of Defendant is Thomas Christopher Retzlaff.
2. There are no other potential parties to this cause of action.
3. The following are the names, addresses, and telephone numbers of all persons having knowledge of facts relevant to Plaintiff's claims, together with a brief statement of that person's connection with the case:

**Thomas Christopher Retzlaff  
PO Box 46424  
Phoenix, AZ 85063  
210-317-9800**

Mr. Retzlaff is the Defendant in this case. Mr. Retzlaff has repeatedly stalked Plaintiff since approximately December 20, 2017 through the filing of frivolous and harassing complaints against him with the State Bar of Texas, contacting Plaintiff's employers and clients, and publishing false and defamatory material about Plaintiff on his "BV Files" website.

**Denise Hollas (Retzlaff)**  
**11833 W Rosewood Dr.**  
**El Mirage, AZ 85335**  
**(Telephone Number Unknown)**

Ms. Hollas is the former spouse of Defendant and has been previously been a victim of stalking by Mr. Retzlaff according to an affidavit dated October 20, 1997. Additionally, Ms. Hollas is the person who allegedly notarized the affidavit attached to Defendant's Anti-SLAPP motion in this case. She is in possession of official notarial records that relate or pertain to this case and, on information and belief, has knowledge of Defendant's ownership of the "BV Files" website and use of the "Dean Anderson" pseudonym.

**Collin Retzlaff**  
**(Current Whereabouts Unknown)**

Collin Retzlaff is the son of Defendant and, on July 23, 2014, filed an affidavit in a California Superior Court case stating "I personally saw him working on the WordPress blogs that attack James McGibney and his company. He's created articles for these blogs and posts material to these blogs. He specifically was using the BV Files account which was tied into a "BVFiles" email address which was clearly visible on the top right of the computer screen. This "BVFiles" account has posted on "BV Files" "McGibney Files" and "ViaView Files" Wordpress blogs.

**Brittany Retzlaff**  
**(Believed to Reside in Lima, Peru)**

Brittany Retzlaff is the daughter of Defendant and has been a victim of sexual abuse by Defendant. On or around October 9, 2014, she filed an affidavit in a California Superior Court case pertaining to the fact that "Dean Anderson" and Defendant are one and the same person.

**Jason Lee Van Dyke**  
**108 Durango Drive**  
**Crossroads, TX 76227**  
**(469) 964-5346**

Jason Van Dyke is an attorney licensed to practice law in the State of Texas and is the Plaintiff in this cause of action. He has personal knowledge of all of the facts stated in Plaintiff's Second Amended Complaint.

**Robert Karlseng**  
**5412 W. Plano Parkway, #101**  
**Plano, TX 75093**  
**972-733-3800**

Mr. Karlseng is the CEO of Karlseng, LeBlanc & Rich L.L.C ("KLR") and Maverick Title of Texas L.L.C. d/b/a Texas Title ("Texas Title"). Mr. Karlseng corresponded with Defendant on numerous occasions while Defendant was using the "Dean Anderson" pseudonym. Mr. Karlseng is the person who terminated Plaintiff's employment after learning that Defendant had posted pictures of him and referred to him and his company in a derogatory manner on the "BV Files" website.

**Claude Rich**  
**5412 W. Plano Parkway, #101**  
**Plano, TX 75093**  
**972-733-3800**

Mr. Rich was Plaintiff's immediate supervisor at KLR. He can verify Plaintiff's work history, salary, dates of employment, and other information relevant to Plaintiff's damages in this case.

**Evan Stone**  
**109 E. Oak Street, #1000**  
**Denton, TX 76201**  
**469-248-5238**

Mr. Stone is an attorney licensed to practice law in the State of Texas and another victim of Defendant. He has in his possession knowledge and information that circumstantially supports Plaintiff's claims that Defendant and "Dean Anderson" are one and the same person, as well as Plaintiff's claim that Defendant is responsible for the content of the "BV Files" website.

**Philip Klein**  
**822 Nederland Ave**  
**Nederland, TX 77627**  
**(409) 729-8798**

Mr. Klein is a private investigator and another victim of Defendant. He is believed to have in his possession knowledge and information that circumstantially supports Plaintiff's claims that Defendant and "Dean Anderson" are one and the same person, as well as Plaintiff's claim that Defendant is responsible for the content of the "BV Files" website.

**John Morgan**  
**2175 North St.**  
**Beaumont, TX 77701**  
**(409) 239-5984**

Mr. Morgan is an attorney licensed to practice law in the State of Texas and is another victim of Defendant. He has represented other victims of Thomas Retzlaff in state court and, on information and belief, is in possession of knowledge and information that circumstantially support Plaintiff's claims that Defendant and "Dean Anderson" are one and the same person, as well as Plaintiff's claim that Defendant is responsible for the content of the "BV Files" website.

**Jason S. Leiderman**  
**5740 Ralston Street, #300**  
**Ventura, CA 93003**  
**(805) 654-0200**

Mr. Liederman is a California attorney who previously represented ViaView Inc. in a claim against Defendant which included sworn declarations of Collin Retzlaff and Brittany Retzlaff in support of a temporary restraining order against Defendant. Mr. Liederman is believed to have knowledge of the current whereabouts of Collin Retzlaff and Brittany Retzlaff, who are essential witnesses in this case.

**James McGibney**  
**5655 Silver Creek Valley Road**  
**San Jose, CA 95138**  
**408-601-0685**

Mr. McGibney is an entrepreneur and victim of Thomas Retzlaff. On information and belief, Mr. McGibney is in possession of knowledge and information that circumstantially support Plaintiff's claims that Defendant and "Dean Anderson" are one and the same person, as well as Plaintiff's claim that Defendant is responsible for the content of the "BV Files" website

**Jeffrey Dorrell**  
**14201 Memorial Drive**  
**Houston, TX 77079**  
**713-522-9444**

Mr. Dorrell previously represented Neal Rauhauser, a known associate of Defendant, in a defamation case. James McGibney was the Plaintiff in that case and Evan Stone was Mr. McGibney's attorney in that case. Mr. Dorrell has been accused on multiple occasions by John Morgan of providing legal aid to Defendant, but he has denied those claims. Mr. Dorrell is a Texas attorney employed by Hanszen Laporte, a law firm which may have previously had some association with Defendant.

4. Pursuant to Local Rule CV-34, no authorizations by Plaintiff are necessary because (a) the physical condition of a party is not at issue in this case; (b) the mental condition of a party is not at issue in this case; (c) lost earnings, lost earning capacity, and back pay are not at issue in this case.
5. A copy of all documents, electronically stored information, witness statements, and tangible things in the possession, custody, or control of the disclosing party that are relevant to the claim or defense of this case are attached to this document.
  - A. State Bar Documents
    - (i) Thomas Retzlaff Complaint
    - (ii) Board of Disciplinary Appeals Letter
  - B. Electronic Mail Communications
    - (i) Correspondence from Defendant ("Dean Anderson")
    - (ii) Correspondence from Karlseng, LeBlanc & Rich L.L.C.
  - C. Content from BV Files website
    - (i) March 8, 2018
    - (ii) March 25, 2018
    - (iii) April 1, 2018
    - (iv) April 6, 2018
  - D. Affidavits From Prior Cases
    - (i) Denise Hollas (Retzlaff)
    - (ii) Collin Retzlaff
    - (iii) Brittany Retzlaff
  - F. Retzlaff Impeachment
    - (i) Criminal History
    - (ii) Sex Offender Order
    - (iii) 73rd District Opinion
    - (iv) 9th District Appellate Opinion

#### **B. DISCLOSURES REQUIRED BY RULE 26(a)**

6. The information required for disclosure under Rule 26(a)(1)(A)(i) is identical to the information disclosed in paragraph three above.
7. The information required for disclosure under Rule 26(a)(1)(A)(ii) is identical to the information disclosed in paragraph five above.
8. The following constitutes a computation of Plaintiff's damages as required by Rule 26(a)(1)(A)(iii):

Loss of Employment	:	\$500,000.00
Damage to Personal Reputation	:	\$4,500,000.00
Damage to Professional Reputation	:	\$5,000,000.00
Mental Anguish	:	\$20,000,000.00
Punitive Damages	:	\$70,000,000.00

9. None of the documents described by Rule 26(a)(1)(A)(iv) exist.

Respectfully submitted,

/s/ Jason Lee Van Dyke  
Jason L. Van Dyke  
State Bar No. 24057426  
108 Durango Drive  
Crossroads, TX 76227  
P – (469) 964-5346  
F – (972) 421-1830  
Email: jason@vandykelawfirm.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing, together with all documents required by the orders of the court and Rule 26(a)(1)(A)(ii) were served on Thomas Christopher Retzlaff, Defendant, by U.S. Certified Mail No. 7017 1450 0000 4188 4291, postage pre-paid, return receipt requested, on April 12, 2018.

/s/ Jason Lee Van Dyke  
JASON L. VAN DYKE